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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. THIRD-PARTY
PAYOR LITIGATION

Civil Action No. 16-3087(MAS)(LHG)

**DECLARATON OF
LINDSEY H. TAYLOR**

LINDSEY H. TAYLOR, ESQ., of full age, hereby declares under penalty of perjury as follows:

1. I am an attorney licensed to practice in New Jersey and am a member of with Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., Lead Counsel and Interim Class Counsel in the above matter. I make this declaration in support of Plaintiffs' application to admit Jake Nachmani *pro hac vice* in the above matter.

2. As is set forth in his Declaration, Mr. Nachmani is a members in good standing of bar of the State of New York, as well as a number of federal bars.

3. Mr. Nachmani will represent Plaintiffs and the proposed class in association with Carella Byrne as attorneys of record. All pleadings, briefs, and other papers filed with this Court in this matter will be signed and filed by an attorney at law of this Court and Carella Byrne will be responsible for his conduct. Further, Carella Byrne will appear at all court proceedings unless otherwise excused by the Court.

4. If this application is granted Mr. Nachmani agrees to:

a. make payment of \$150.00 to the Clerk of the U.S. District Court in accordance with Local Civil Rule 101.1(c)(3) as amended, within 20 days from the date of the executed Order;

b. make payment to the New Jersey Lawyers' Fund for Client Protection pursuant to New Jersey Court Rule 1:28-2(a);

c. abide by New Jersey court rules;

d. notify this Court immediately of any matter affecting their standing at the bar of any other court; and

e. have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

5. Prior to making this application, I contacted counsel for Defendants to request their consent for Mr. Nachmani's *pro hac vice* admission. I was advised that the Defendants consented.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: December 5, 2016

/s/ Lindsey H. Taylor
LINDSEY H. TAYLOR